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January 22, 2021

VIA ECF

The Honorable Allyne R. Ross United States District Judge United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: Martinez v. Redbubble Inc. (1:20-cv-06293) (ARR) (PK)

Joint Notice of Settlement and Request for Adjournment of All Pending Dates

Dear Judge Ross:

We represent Redbubble Inc. ("Defendant") in the above-referenced matter. On behalf of Defendant and plaintiff Pedro Martinez ("Plaintiff"), we hereby inform the Court that the parties have reached a settlement in principle. We anticipate that the parties will draft and execute their settlement agreement and file a stipulation of dismissal with prejudice within the next forty-five (45) days. Given that the parties have resolved the litigation, we respectfully request that this Court adjourn all pending dates *sine die* (including the deadline for Defendant to file its response to the Complaint) and provide the parties with forty-five (45) days to file their anticipated stipulation of dismissal.

We thank the Court for its attention to this matter.

Respectfully submitted,
/s/ Ernest Edward Badway
Ernest Edward Badway

cc: Dan Shaked, Esq. (via ECF)